

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
1:12cv334 and 1:13cv9**

P.B., as lawful guardian ad litem )  
of Minor Child, JANE DOE, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
BURKE COUNTY PUBLIC SCHOOLS )  
BOARD OF EDUCATION, LINDA )  
BRADSHAW, JOHN ROES 1–10, )  
and MICHAEL ANDREW ALEXANDER. )  
 )  
Defendants. )

**MOTION FOR APPROVAL OF  
MINOR SETTLEMENTS**

**1:12cv334**

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A.B., as lawful guardian ad litem )  
of Minor Child, L.B., )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
BURKE COUNTY PUBLIC SCHOOLS )  
BOARD OF EDUCATION, LINDA )  
BRADSHAW, JOHN ROES 1–10, )  
and MICHAEL ANDREW ALEXANDER. )  
 )  
Defendants. )

**Consolidated for  
discovery and trial**

**1:13cv9**

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NOW COME Plaintiffs, P.B., as lawful guardian *ad litem* of Minor Child, Jane Doe, and A.B., as lawful guardian *ad litem* of Minor Child, L.B., and move the Court for an order approving the proposed minor settlements reached in this matter. In support of this Motion, Plaintiffs show unto the Court:

1. Settlements have been reached with regard to all claims of each minor child other than those against Defendant Michael Andrew Alexander, as indicated by a supporting settlement disbursement sheet which Plaintiffs seek, in a Motion filed contemporaneous hereto, to file under seal.

2. Plaintiffs submit that their counsel have provided good and valuable legal services and are entitled to fees as indicated on the supporting settlement disbursement sheet which Plaintiffs seek, in a Motion filed contemporaneous hereto, to file under seal.

3. Plaintiffs submit that their counsel have advanced reasonable and necessary case expenses for which they are entitled to reimbursement as indicated on the supporting settlement disbursement sheet which Plaintiffs seek, in a Motion filed contemporaneous hereto, to file under seal.

4. Plaintiffs respectfully submit that the settlements reached are fair and reasonable, and are in the best interests of the minor children.

5. Pursuant to Local Rule 7.1, the undersigned has conferred with counsel for the represented Defendants and they consent to this Motion.

WHEREFORE, the undersigned respectfully request that the Court issue an Order approving the proposed minor settlements with regard to minor plaintiffs, Jane Doe and L.B.

Respectfully submitted this the 27<sup>th</sup> day of May, 2014.

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**COUNSEL FOR PLAINTIFFS**

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that in conformity with Rule 5 of the Rules of Civil Procedure that a true copy of the foregoing pleading has been served upon all parties entitled or required to be served by mailing a copy of the document in a properly addressed envelope with sufficient postage affixed thereto. Alternatively, and further, pursuant to Fed. R. Civ. P. 5 and Local Civil Rule 5.3 this document has been filed by electronic means in compliance with the rules and service has been effected by electronic means through the Court's transmission facilities as authorized by Rule 5.3 and in conformity of these rules this 27th day of May, 2014.

Mr. Michael A. Alexander  
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Via ECF:

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